



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NS
F.#2020R00275

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 22, 2022

By E-Mail and ECF

Mr. Nora Hirozawa, Esq.
Federal Defenders of New York, Inc.
Eastern District of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

E-Mail: Nora_Hirozawa@fd.org

Re: United States v. Donnell Russell
Criminal Docket No. 20-427 (AMD)

Dear Ms. Hirozawa:

Enclosed please find additional discovery in the above-captioned case in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also continues to request reciprocal discovery from the defendant. Enclosed please find copies of the following items.

| <u>Discovery Exhibit</u> | <u>Description</u> |
|------------------------------|---|
| 43 | Amended Affidavit and Search Warrant for "Surviving Lies" Facebook Page |
| 44 | Screenshot of YouTube program on which the defendant appeared on January 25, 2020 |
| 45 | NYPD Police Laboratory Report re Handwriting Analysis |

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| 46 | Copy of envelope sent to Lydia Hills ¹ |
| 47 | Spirit Airlines records for Cavonttey Jones and Michael Williams |
| 47a | Business records certification for Discovery Exhibit 47 |
| 48 | Portions of forensic examination report of phone seized from Robert Kelly with phone number ending in 8219 and related photographs (DX 48(a)-(f)) |